

Appl. No. 09/765,119  
Amdt. Dated July 29, 2004  
Reply to Office action of April 29, 2004  
Attorney Docket No. P12684/27943-00408USP1  
EUS/J/P/04-6168

### **REMARKS/ARGUMENTS**

#### **1.) Claim Amendments**

The Applicant has amended Claims 1, 3-6, 10, 14, 17 and 20; Claims 2, 11, 23, and 25-30 have been cancelled. Applicant respectfully submits no new matter has been added. Accordingly, Claims 1, 3-10, 12-22 and 24 are pending in the application. Favorable reconsideration of the application is respectfully requested in view of the foregoing amendments and the following remarks.

#### **2.) Examiner Objections – Specification**

The Examiner objected to the specification because of several informalities. The Applicant thanks the Examiner for his careful review of the specification. In response, the Applicant has modified the specification as suggested by the Examiner. The Examiner's consideration of the amendments to the Specification is respectfully requested.

#### **3.) Claim Rejections – 35 U.S.C. § 102(e)**

The Examiner rejected claims 1-2, 4-6, 9-15, and 17-30 under 35 U.S.C. § 102(e) as being anticipated by Christie et al (US 6,480,493). Applicants respectfully traverse the Examiner's rejection and have further amended the independent Claims to more clearly and distinctly claim the subject matter which Applicants consider as their invention. A favorable reconsideration of the now amended claims is respectfully requested.

As fully disclosed in the present application, it would be advantageous to re-use and/or extend the life of existing switches when combining narrowband networks (first node) with broadband transport mechanisms (second node). The present invention is therefore directed to employing first and second nodes in a telecommunication system to combine narrowband and broadband transport mechanisms. Accordingly, as claimed, the first node includes call control functions while the second node only includes the connection control functions. Since the second node lacks any connection control functions, any call data and connections received by the second node somehow

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have to be processed and handled. In accordance with the teachings of the present invention, the second node is therefore adapted to rely on the first node for such call control functions. In order to provide such communication and call control function related supports, there are at least two links established between the first node and the second node. As further claimed by the present invention, a first link is used for transmitting data information between the two nodes. As further recited by the pending claims, a second link is further provided between the two nodes to separately transmit signaling information between the two nodes.

As a result, from the second node's point of view, all call control functions are communicated and directed by the first node. The second node communicates received-data-information over the first link whereas it further communicates signaling information over the separate second link to the first node.

Applicants respectfully submit that Christie fails to anticipate or render obvious the present invention. As a matter of facts, Christie actually teaches away from such a total separation of call control and connection control by stating that such "a system is not yet defined to a point of sufficient for implementation":

"At least one system has suggested routing user service requests to a call server that is external to a switch. However, this system requires that the call processing be separated from connection processing. .... This system is not yet defined to a point sufficient for implementation." (Christie, Col. 2, lines 49-60).

Applicants respectfully submit that the present invention enables such a separation by allowing the transport mechanism (second node) to communicate not only the signaling information, but also retain the capability to transmit data information to the first node over a separate link. Furthermore, in order to achieve such a separation of the connection control from the call control, the second node is not equipped with any call control functionalities and relies on the first node for such functions. Applicants submit that Christie therefore fails to disclose or teach the recited elements of the current invention.

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In further rejecting all of the independent claims, the Examiner stated that Fig. 2 of Christie allegedly disclosed the second node adapted to rely on the first node for call control functions. However, the second node (as now recited by the amended claims) in the present invention is not equipped with any call control functions and adapted to rely on the first node for receiving any call control functionalities. However, Fig. 2 of Christie clearly shows the second node (ATM switch, 225) containing not only switch fabrics (connection control functions), but also the call process (call control functions). Fig. 2 of Christie also shows the first node (narrowband switch, 215) likewise containing a switch fabric as well as a call process. Accordingly, Christie fails to disclose or teach a system wherein a second node (such as the ATM switch 225) containing only the connection control functions (switch fabric) and adapted to rely on the first node (such as the narrowband switch 215) for receiving call control functions over a two separate links. In other words, the narrowband switch 215 in Christie fails to control the ATM switch (lacking any call intelligence) in accordance with the teachings of the present invention.

For at least the above reasons, Applicants respectfully submit that Christie cannot be used to anticipate or render obvious the present invention and a Notice of Allowance of all pending independent claims are earnest requested.

#### 4.) Claim Rejections – 35 U.S.C. § 103 (a)

The Examiner rejected claims 3, 7 and 16 under 35 U.S.C. § 103(a) as being unpatentable over Christie in view of Constantinof et al. (US 6,381,246).

These Claims depend from now allowable independent claims and recite further limitations in combination with the novel elements thereof. Therefore, the allowance of these dependent claims is respectfully requested.

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### CONCLUSION

In view of the foregoing remarks, the Applicant believes all of the claims currently pending in the Application to be in a condition for allowance. The Applicant, therefore, respectfully requests that the Examiner withdraw all rejections and issue a Notice of Allowance for all pending claims.

The Applicant requests a telephonic interview if the Examiner has any questions or requires any additional information that would further or expedite the prosecution of the Application.

Respectfully submitted,

  
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